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Code Administrator Meeting

Summary

Workgroup Meeting 9: GSR035 System Access Reform- Review of the operational requirements on the Onshore Systems

Date: 14 September 2026

Contact Details

Chair: Lurrentia Walker, Lurrentia.Walker@neso.energy

Proposer: Dozie Nnabuife, Dozie.Nnabuife@neso.energy

Key areas of discussion

The Chair welcomed the Workgroup members and observers to Workgroup 9 and gave a brief outline of the agenda.

Objectives and Timeline

The Chair confirmed that the Workgroup meeting was intended to be the final session before consultation. The Workgroup Consultation is targeted for issue on 21 September 2026 and is expected to remain open for 15 business days, closing on 12 October 2026. Two further Workgroup meetings and one contingency meeting have been scheduled after consultation, with the aim of issuing the Workgroup Report to the SQSS Panel on 10 November 2026 ahead of the Panel meeting on 20 November 2026.

Action Log Review

Action 33 and Action 34 (closed)

Actions 33 and 34 were reviewed in relation to Appendix K and the comments received from Workgroup members. The Workgroup discussed whether the outstanding points had been addressed through the revised wording and agreed that the actions could be treated as closed, subject to the revised Appendix K text being checked and approved by Legal before consultation.

Review of Legal Text

The Workgroup reviewed Appendix K and related consultation wording, focusing on the OCRA methodology, collaborative development, reporting, agreement or objection processes, escalation and decision-making where affected parties disagree with an assessment outcome.

Appendix K5 wording was discussed to confirm that the OCRA methodology, including future changes, would be developed by NESO and onshore licensees in collaboration with relevant industry parties, with consultation input considered before submission to the Authority.

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Workgroup members agreed that the assessment should consider the balance between potential consequences and achievable benefits. Reporting is expected to form part of the OCRA methodology, including annual reporting, rather than the SQSS legal text.

Workgroup members discussed how affected parties should participate in assessments, including the need to seek agreement or consensus while allowing parties to register agreement, a position or objection. Further drafting was needed to avoid ambiguity or implying a predetermined outcome.

The Workgroup considered whether Appendix K should include a high-level escalation or decision-making process where affected parties disagree. Members noted the need for safeguards relating to safety, legal obligations and operational responsibilities, with Appendix K6.5 added to protect applicable NESO SQSS objectives.

Revised Appendix K6.3 and K6.4 wording was reviewed to separate collaboration, agreement or objection, and decision-making where objections arise. Workgroup members were broadly comfortable, subject to Legal review and final wording checks against paragraph 5.11.3.

OCRA triggers, preconditions and any disproportionality test or engineering judgement should be set out in the OCRA methodology, rather than framed only as part of the risk assessment process.

Workgroup Consultation Report

The Workgroup reviewed the draft Workgroup Consultation Report and agreed updates were needed to clarify the OCRA methodology, cost-benefit analysis, reporting, initial solution, Appendix K references, governance arrangements and consistent use of “the Authority” and “Ofgem”.

The draft Workgroup Consultation Report will explain that the OCRA methodology will be developed with NESO, licensed network operators and other relevant parties. Organisations will nominate suitable representatives through existing Outage Planning or company routes, rather than through an open invitation process.

Workgroup members noted that ownership of the structured process is not yet settled and should not be presented as final. Any Subject Matter Experts (SMEs) involved would act as company representatives, and final ownership would need to be agreed through the OCRA process and with the Authority.

The Workgroup distinguished between process ownership or administration, and initiation or application for individual outages. For TO outages, OCRA would be TO-triggered, although NESO could identify a potential need or benefit and refer this to the relevant TO. A TO, could withdraw its outage request at any stage.

Mark Bowker noted National Grid Electricity Transmission’s view that the party accountable for risk consequences should have appropriate control over the risk assessment process. The Workgroup agreed that ownership, administration, initiation, application, decision-making and consequence accountability are distinct and need further clarity.

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The Workgroup agreed that case studies 1 and 2 should move to an annex, as they do not clearly demonstrate the need for clause 5.11.3. Case study 4 will be reviewed to confirm whether it requires OCRA; if not, it will also move to the annex.

Workgroup Consultation questions will be aligned with the final Appendix K position and tidied before circulation. If consensus is not reached, alternative options may need to be presented for stakeholder comment.

The Workgroup discussed whether to ask a specific consultation question on OCRA ownership or administration. Views differed on whether this should be consulted on, as final determination would sit with NESO, TOs and the Authority. Alan Creighton may draft a question if required. Questions will be refined to avoid duplication, distinguish Appendix K high-level principles from the supporting OCRA methodology, and ask consultees to explain their rationale where further SQSS detail or governance is suggested.

A question on which SMEs should develop the OCRA methodology was not required, as organisations will choose their own representatives. A broader catch-all question will be retained. Financial mechanisms or compensation arrangements are not proposed to sit within SQSS. However, the OCRA methodology and cost-benefit analysis should consider relevant consequences, including consumer benefits, constraint costs, impacts on affected parties and applicable interruption-related obligations.

The drafting of the Workgroup Consultation Report will clarify that OCRA is intended for limited, controlled and exceptional circumstances, while recognising that some scenarios may be foreseeable enough to justify a standardised methodology rather than repeated derogations. Legal-approved amendments will be circulated to the Workgroup before publication. The consultation period was confirmed as 15 business days, with any extension requiring further approval.

Any other Business

No further items of any other business were raised at the Workgroup.

Next Steps

The consultation is scheduled to be issued on 21 September 2026 and close on 12 October 2026. Before publication, the Chair will circulate a clean version, following Legal approval of the revised Appendix K text. The document will be tidied to ensure the consultation questions, governance wording, Appendix K references and Authority/Ofgem terminology are consistent. It will also clarify the OCRA methodology development process, including participation, nomination routes, ownership, triggers and preconditions. Case studies 1 and 2 will move to an annex, and case study 4 will be reviewed to determine whether it should remain in the main body. Consultation questions will be refined to remove duplication and request supporting rationale. Post-consultation, two Workgroup meetings and one contingency meeting are scheduled to review responses and progress the Workgroup Report to the SQSS Panel on 10 November 2026.

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Actions

For the full action log, click [here](#).

Action Number	Workgroup Raised	Owner	Action	Due by	Status
35	WG9	DN / BA	Seek Legal approval of the remaining Appendix K amendments and provide confirmation to the Chair.	15 Sept 2026	Open

Attendees

Name	Initial	Company	Role
Lurrentia Walker	LW	NESO, Code Administrator	Chair
Kayte Stanton-Hughes	KSH	NESO, Code Administrator	Technical Secretary
Dozie Nnabuife	DN	NESO	Proposer
Andrew Allan	AA	RWE	Observer
Alan Creighton		Northern Powergrid	Workgroup Member (Alternative)
Bieshoy Awad	BA	NESO	NESO Representative
Bukky Daniel	BD	EDF Energy	Workgroup Member
Calum Watkins	CW	Ofgem	Authority Representative
Claire Newton	CN	NESO	Observer
Ethan Lau	EL	NESO	Observer
Fraser Scott	FS	SSEN Transmission	Workgroup Member (Alternative)
Garth Graham	GG	SSE	Workgroup Member (Alternative)
Graeme Vincent	GV	SP Energy Networks	Workgroup Member (Alternative)
Mark Bowker	MB	National Grid	Workgroup Member
Maria Lopez	ML	NESO	Observer
Martin Cammidge	MC	SP Energy Networks	Workgroup Member
Muhammad Abrar	MA	NESO	Observer
Steve Quinn	SQ	National Grid	Workgroup Member